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*Attorney for Justin Lee Tripp*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUSTIN LEE TRIPP,

Defendant.

CASE NO.: 2:20-cr-00237-APG-DJA-1

**STIPULATION AND PROPOSED ORDER  
TO EXTEND DEADLINE TO FILE  
REPLY TO TRIPP'S COMPASSIONATE  
RELEASE  
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by Jacqueline Tirinnanzi, counsel for Justin Lee Tripp, and Kimberly Frayn, counsel for the United States of America, that the current December 7, 2022 deadline on which defendant must file his Reply to the Government's Response to Defendant's Motion and Motion Supplement for Compassionate Release, be extended 7 days to on or before December 14, 2022, for the following reasons:

This stipulation is entered into based upon the following reasons:

1. In March 2022, defendant filed a pro se motion for compassionate release, addressing numerous potential bases for the request. ECF No. 102.
2. Initially, counsel was having difficulty reaching Mr. Tripp at FCI Herlong (due to on and off lockdowns) and required the opportunity to speak with defendant before she could meaningfully determine whether a supplement in support of compassionate

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release was appropriate. Additional extensions were required for purposes of awaiting receipt of documentation relevant or potentially relevant in support of the motion.

3. Defense counsel filed the supplement to Mr. Tripp's Motion for Compassionate Release (ECF No. 102) on October 4, 2022. ECF No. 114.
4. Upon the agreement of the parties, the government was allotted until November 30, 2022, to file their response. ECF No. 121. The government filed its response on November 30, 2022, which including exhibits, contains 88 pages of materials. ECF No. 123.
5. Defendant's reply is currently due December 7, 2022. ECF No. 123. At this time, defense counsel requires an additional seven days to file its reply, due to other competing deadlines and obligations, especially given the amount of material covered in the government's response.
6. The parties agree to the extension of time. Mr. Tripp is in BOP custody and does not object to the extension.
7. This is the first request for extension of time to file Mr. Tripp's reply.
8. The additional time requested herein is not sought for purposes of delay, but merely to allow Mr. Tripp sufficient time to file his reply.

Dated this 7<sup>th</sup> day of December 2022.

/s/ Jacqueline Tirinnanzi  
Jacqueline Tirinnanzi  
Counsel for Justin Lee Tripp

/s/ Kimberly Frayn  
Kimberly Frayn  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA  
3

4 UNITED STATES OF AMERICA,

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8 Defendant.  
9

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**ORDER**

10 Based upon the stipulation of counsel, and good cause appearing, IT IS HEREBY  
11 ORDERED that Defendant's Reply to the Government's Response to Defendant's Motion and  
12 Motion Supplement for Compassionate Release shall be due on or before December 14, 2022.  
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19 DATED: December 8, 2022  
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24 THE HONORABLE ANDREW P. GORDON  
25 UNITED STATES DISTRICT JUDGE  
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